

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: GWG Holdings, Inc., <i>et al.</i> , ¹ Debtors.	§ § § § § § §	Chapter 11 Case No. 22-90032 (MI) (Jointly Administered)
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**THE OFFICIAL COMMITTEE OF BONDHOLDERS’
WITNESS AND EXHIBIT LIST FOR HEARING ON NOVEMBER 17, 2022**
[Related to Document No. 1061]

The Official Committee of Bondholders (the “Committee”) of GWG Holdings, Inc. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) file this witness and exhibit list (the “Witness and Exhibit List”) for the hearing scheduled for **November 17, 2022 at 1:30 p.m. (CT)** before the Honorable Marvin Isgur at the United States Bankruptcy Court for the Southern District of Texas, Courtroom 404 (MI), Houston, Texas 77002 (the “Hearing”).

WITNESSES

The Committee may call any of the following witnesses at the Hearing:

1. David Chavenson;
2. David de Weese;
3. Murray Holland;
4. Timothy Evans;
5. Any witness necessary to lay the foundation for the admission of exhibits; and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ proposed claims and noticing agent: <https://donlinrecano.com/gwg>.

6. Any rebuttal and/or impeachment witnesses.

EXHIBITS

The Committee may offer into evidence any one or more of the following exhibits:

EXHIBIT NO.	DESCRIPTION	M A R K	O F F E R	O B J E C T	A D M I T	W/D	Disposition After Trial
1	March 3, 2020 Board of Directors Meeting Minutes [GWG000006397] [FILED UNDER SEAL]						
2	March 3, 2020 Board of Directors Meeting Minutes [GWG-SEC-0219355] [FILED UNDER SEAL]						
3	April 15, 2020 – July 23, 2020 Special Committee Meeting Minutes [GWG-SEC-0159404] [FILED UNDER SEAL]						
4	July 10, 2020 Murray Devine Draft Financial Opinion [GWG-SEC-00101657] [FILED UNDER SEAL]						
5	Preferred Series C Unit Purchase Agreement [BEN_0002780] [FILED UNDER SEAL]						
6	September 8, 2020 Board of Directors Meeting Minutes [GWG00068134] [FILED UNDER SEAL]						
7	October 19, 2020 Email from David Gruber to Daniel Fine and Roy Bailey [FSC0004548] [FILED UNDER SEAL]						
8	October 27, 2020 Special Committee Meeting Minutes [GWG00071406] [FILED UNDER SEAL]						
9	October 29, 2020 Board of Directors Meeting Minutes [GWG00068142] [FILED UNDER SEAL]						
10	October 29, 2020 Board of Directors Meeting Slide Deck [GWG00067859] [FILED UNDER SEAL]						
11	December 16, 2020 Special Committee Meeting Minutes [GWG00071408] [FILED UNDER SEAL]						

EXHIBIT NO.	DESCRIPTION	M A R K	O F F E R	O B J E C T	A D M I T	W/D	Disposition After Trial
12	January 19, 2021 Email from Murray Holland [GWG-SEC-6SUB-00233765] [FILED UNDER SEAL]						
13	January 25, 2021 Email from Timothy Evans [GWG-SEC-00219343] [FILED UNDER SEAL]						
14	December 16, 2020 Special Committee Memorandum [GWG-SEC-00219351] [FILED UNDER SEAL]						
15	January 25, 2021 Board of Directors Meeting Minutes [GWG00069430] [FILED UNDER SEAL]						
16	February 12, 2021 Request for Funding [GWG00050689] [FILED UNDER SEAL]						
17	February 10, 2021 Email from Timothy Evans to Daniel Fine [GWG-SEC-00159450] [FILED UNDER SEAL]						
18	February 17-18, 2021 Email Chain [FSC0001326] [FILED UNDER SEAL]						
19	February 23, 2021 Email from Daniel Fine to Timothy Evans [FSC0001266] [FILED UNDER SEAL]						
20	February 24-25 Emails [FSC0001159] [FILED UNDER SEAL]						
21	February 24, 2021 Special Committee Meeting Minutes [GWG00071417] [FILED UNDER SEAL]						
22	March 1, 2021 Email from Pete Cangany [FSC0006470] [FILED UNDER SEAL]						
23	February 27, 2021 – March 2, 2021 Email Chain [GWG-SEC-0284818] [FILED UNDER SEAL]						
24	February 27, 2021 Emails [FSC0006390] [FILED UNDER SEAL]						
25	March 3, 2021 Emails [GWG-SEC-4SUB-00046367] [FILED UNDER SEAL]						

EXHIBIT NO.	DESCRIPTION	M A R K	O F F E R	O B J E C T	A D M I T	W/D	Disposition After Trial
26	March 4, 2021 Emails [FSC0005069] [FILED UNDER SEAL]						
27	March 4, 2021 Emails between Special Committee Members [FSC0000094] [FILED UNDER SEAL]						
28	January 25, 2021 – March 25, 2021 Board of Directors Meeting Minutes; May 12, 2021 Board of Directors Meeting Slide Deck [GWG00068430] [FILED UNDER SEAL]						
29	March 5, 2021 Email from Pete Cangany to Roy Bailey [FSC0007012] [FILED UNDER SEAL]						
30	March 5, 2021 Email from Murray Holland to Roy Bailey [FSC0004608] [FILED UNDER SEAL]						
31	March 9, 2021 Emails Between Daniel Fine and Roy Bailey [FSC0000061] [FILED UNDER SEAL]						
32	March 10, 2021 Email from Murray Holland to Roy Bailey, Daniel Fine, and Jeff MacDowell [FSC0000058] [FILED UNDER SEAL]						
33	March 6, 2021 Jeff MacDowell Resignation Email Cover Page [FSC0000067] [FILED UNDER SEAL]						
34	March 6, 2021 Jeff MacDowell Resignation Email [FSC0000068] [FILED UNDER SEAL]						
35	March 6, 2021 Daniel Fine Resignation Email Cover Page [FSC0016071] [FILED UNDER SEAL]						
36	March 6, 2021 Daniel Fine Resignation Email [FSC0016072] [FILED UNDER SEAL]						
37	March 6, 2021 Roy Bailey Resignation Email Cover Page [FSC0005118] [FILED UNDER SEAL]						
38	March 6, 2021 GWG Holdings Inc. Form 8-K [GWG00085766]						

EXHIBIT NO.	DESCRIPTION	M A R K	O F F E R	O B J E C T	A D M I T	W/D	Disposition After Trial
39	September 20, 2019 Special Committee Meeting Minutes [GWG00006358] [FILED UNDER SEAL]						
40	March 3, 2021 Board of Directors Meeting Minutes [GWG00069425] [FILED UNDER SEAL]						
41	December 4, 2020 Email Chain [GWG00050905] [FILED UNDER SEAL]						
42	Revised March 6, 2021 GWG Holdings Form 8-K/A						
43	May 12-15, 2020 Emails [GWG-SEC-00261638] [FILED UNDER SEAL]						
44	May 15, 2020 Credit Agreement Amendment [GWG-SEC-00261648] [FILED UNDER SEAL]						
45	November 30-December 5, 2020 Emails [GWG00050905] [FILED UNDER SEAL]						
46	November 1, 2022 Roy Bailey Deposition Transcript (Designations Forthcoming) [FILED UNDER SEAL]						
47	October 28, 2022 Daniel Fine Deposition Transcript (Designations Forthcoming) [FILED UNDER SEAL]						
48	November 2, 2022 Daniel Fine Deposition Transcript (Designations Forthcoming) [FILED UNDER SEAL]						
	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases						
	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party						
	Any exhibit listed by any other party						

The Committee not only reserves the right to—but expects to—further amend or supplement the Witness and Exhibit List at any time prior to or during the Hearing. Given that document production is still ongoing and will occur after the filing of this Witness and Exhibit List, amending this Witness and Exhibit List will be necessary to incorporate all relevant and required documents and witnesses for the Hearing.

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Houston, Texas

Dated: November 16, 2022

By: /s/ Eric M. English

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*Counsel to the Official Committee of Bondholders of
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CERTIFICATE OF SERVICE

I hereby certify that, on November 16, 2022, a true and correct copy of the foregoing document was served via email through the Bankruptcy Court's Electronic Case Filing System on the parties that have consented to such service.

/s/ Eric M. English
Eric M. English